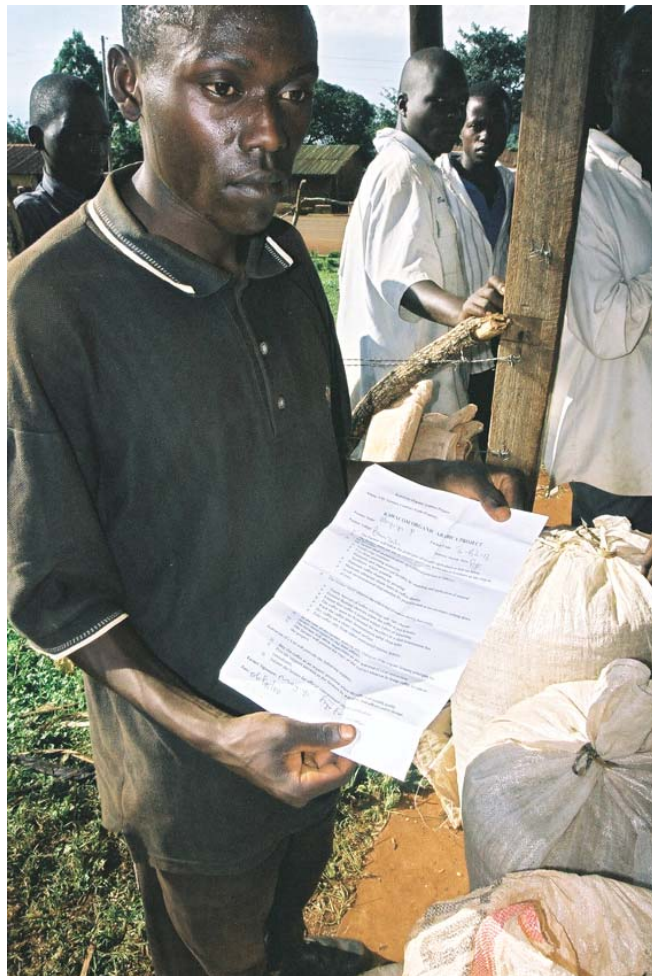




EXPORT PROMOTION OF
ORGANIC PRODUCTS FROM AFRICA

Experiences with Certification in EPOPA



October 2008



EPOPA (Export Promotion of Organic Products from Africa) is a development programme initiated by the Swedish International Development Cooperation Agency, Sida, in 1997.

EPOPA offers thousands of African smallholder farmers opportunities for improved livelihoods through the development of organic products for export.

The programme has been evaluated twice and has proven to deliver both increased business for exporters and increased income for farmers.

For more information about EPOPA visit: www.epopa.info

EPOPA is implemented by a consortium of Agro Eco BV and GroLink AB, specialised organic consultants.



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1. Executive summary

This study documents some of the experiences of EPOPA has had supporting companies with contract farmers going through the organic certification process as well as the work done in the establishment of local certification organizations in Tanzania and Uganda. The report, it is hoped, can help those applying for certification, those assisting them, and the certification bodies to improve the system and its implementation. Finally, it can give those regulating market access for organic products in importing countries (authorities, accreditation bodies) a better understanding of the conditions under which producers, exporters, and certification bodies work.

The report is based on observations and analyses as well as an inquiry with exporters, inspectors, consultants, and certification bodies.

EPOPA helped companies acquire certification through support for certification costs and technical assistance in the certification process, including negotiations with the certification bodies; by training project staff to handle Internal Control Systems and by contracting the certification services. In addition, EPOPA supported the establishment of local organic certification organizations in Tanzania and Uganda. Those two organizations, TanCert and UgoCert, got international accreditation in 2008 and are now well-established to service the local certification needs. The ability of the organic sector in Tanzania and Uganda to manage certification-related issues has been greatly increased through the intervention of EPOPA. Nevertheless, many issues will pose challenges in the future.

For the new operators, organic certification is often difficult to understand and handle. Many other issues, such as production and sales, are likely to be more important. From the certification body's side, it is felt that new exporters do not always take the certification process seriously enough.

After some years, certification is much more understandable and manageable for the exporter but quite a lot of work time and funds are spent. There are both formal and informal contacts between the exporter and the actors that can give information about certification. At the exporter company, there is a senior person in charge of the certification issues. The interviewed companies had on average 15 -20 contacts per year with different actors (certification body, EPOPA, inspector) about certification. There is now better understanding from both the exporter and the certification body about each other's procedures and where problems can occur. However, almost all companies use or want to use a local consultant to handle certification after the EPOPA support has ended, which indicates that they still consider it difficult to deal with.

The cost of certification is seen by the exporters as extremely high in the first years when no products can be sold for a higher price. When there are good sales of bigger volumes and there is a good price, the interviewed exporters see the cost of certification as a cost among others and not such a big problem.

For the exporters, the main recommendation is to allocate sufficient resources and qualified staff (perhaps supplemented by consultants) to the certification process, otherwise they will fail. They should also try to understand the process and the work situation of inspectors and the certification body. Finally, they should demand timely, accurate, and respectful service from the certification body as well as clearly formulated decisions and corrective action requests that are based on standards and certification requirements.

Certification bodies should improve their information to the operators as well as their communication. It is known by all certification bodies that it is difficult to get information through and to be taken up by the client. Still, simple clear information, both in writing and orally, is needed. Certification bodies should also try to look ahead to anticipate problems that might arise and not just come down on them when they happen.¹ Certification bodies should also limit their requirements to what is really demanded in the standards and related documents and not adopt an unnecessarily strict interpretation of standards. They should also try to accommodate the various businesses and cropping cycles in their process, instead of trying to make everybody fit their administrative systems.

For the consultant, it has to be key to make the client capable of having ownership and handling their own system. In the end, the most successful consultant makes her or himself redundant.

A question is whether the group certification system is too complicated and rigid and whether it would be possible to simplify the system so that more producers could have an easier way of getting certified without risking the organic integrity. Certification should be a tool, but with the degree of complication it almost becomes the main issue. A risk-based approach can both save time and create better efficiency. Only the most essential facts should be gathered; forms and reports should be kept short and focused. Yield estimates should only be requested by the certification body when they are a tool to hinder farmers to deliver conventional crops from someone else.

The weak aspects of the group certification system have more to do with incomplete documentation and breaking down computer systems than the use of chemical fertilizers and pesticides. Today exporters are learning how to handle the system, even while complaining about its difficulty and cumbersomeness, but without any real possibility of influencing or changing the system. The certification bodies running the certification system have little incentive to change anything. They are concerned about their own accreditations and guaranteeing market access for the certified products. The creative development of the system to be simpler is therefore not strong.

¹ International norms limits the ability of certification bodies to act as advisors to some extent, still there is space in the norms for them to do more in order to help the operators, more than many of them are doing.

2. Introduction

In the EPOPA project, many companies have gone through certification. In total, 35 companies in Uganda, Tanzania, and Zambia have been part of EPOPA and had their production certified as organic. They have been newcomers in the organic sector, and the process to achieve and maintain certification has sometimes been cumbersome. The project consultants in EPOPA have all supported their companies through the certification process and also in contacts with the inspector and other certification body personnel. Two local emerging certification bodies and three international certification bodies have been involved in the process.

In this report, EPOPA intends to share the experiences with certification of organic production in Tanzania and Uganda. It contains three main parts:

- a description of how EPOPA worked with certification
- a summary of the work EPOPA did to support the development of national certification bodies and standards
- the result of a special study EPOPA did on how the parties experienced certification and how it worked in practice.

In addition, it contains the results of a study by Naturland as well as the authors' analysis of the situation.

The main purpose of the report is to spread knowledge and share experiences. Hopefully the report can help those applying for certification, those assisting them, and the certification bodies to improve the system and its implementation. Finally, it can give authorities and accreditation bodies in importing countries a better understanding of the conditions under which producers, exporters, and certification bodies work.

EPOPA worked mainly with two certification organizations, and the results are therefore applicable to how they implement the certification process. However, the EPOPA consultants have worked with many other certification bodies in other contexts, and most of the issues raised in this report would have been the same had EPOPA worked with other organizations. The opinions in this report, from exporters and others, relate also to some other certification bodies active in the area.

EPOPA also did some work with other certification and quality-assurance systems such as Utz Certified, GlobalGAP, HACCP, and Fair Trade. A report on Fair Trade and Ethical trading standards is available at www.epopa.info.

Terminology used

In this report (and especially in the interviews), a number of words may require an explanation.

The words exporter, company, project, client, and operator mean more or less the same thing; different actors use different words. From EPOPA's point of view, a project is run by an exporting company or, in short, an exporter. The project which EPOPA is dealing with can be the whole or part of a company's business. From the certification body, the company is called an operator or client; it is running organic production, which sometimes is called a project. The company probably calls itself a company or a business.

A certification body is also called a certifier and in the interviews sometimes a CB. In the text, IMO and Naturland are often called the international certification body or bodies. UgoCert and TanCert are often called the local certification body or bodies. They are sometimes called the inspection body, as they are doing inspection of the operators on behalf of the international certification bodies. In the text, the name of the certification bodies is written out only when it has been seen as more clarifying to do so.

All projects have groups of farmers certified in a group certification system. There is an internal control system (ICS) to demonstrate that the smallholder farmers are fulfilling the organic standards. The system is documented in an ICS manual. The field officers (FO) are employed by the exporter to do internal inspections of all smallholder farmers. The field officers also function as farmer trainers and advisers.

If the operator has failed to comply with standards or certification requirements, this is called a non-conformity or a violation. The certification body can choose from a range of actions depending on the severity of the non-conformity (for example, when the integrity of the certified production has been lost, when the action was intentional, and when non-organic products have been sold as organic). The measures taken can be called sanctions, conditions, a corrective-action request or corrective measures.

3. Background description of certification in EPOPA projects

Certification in EPOPA

EPOPA supported exporters in Tanzania, Zambia and Uganda to sell organic products in markets all over the world. Therefore there is a demand for certification to a range of standards and legislations, like the European, U.S. and Japanese legislation, and there are also individual certification bodies with specific requirements. However, certification to the EU regulation 2092/91 was the most important standard.

Contracting certification

In order to be able to assist the many projects, EPOPA management decided in 2002 to contract one certification body for Tanzania and Uganda each to provide the certification service for all the projects. After tendering, a contract was signed in May 2003 with IMO & Naturland for projects in Tanzania. KRAV & Soil Association consortium made the most attractive offer for Uganda. But then KRAV, which had done all EPOPA certification up to then, decided, in October 2003, to close down its international operations, and that offer evaporated. The consultants then approached IMO & Naturland to work out an agreement for Uganda also. As long as EPOPA supported the cost of certification, all exporters were certified by IMO & Naturland. If the destination market needed other certifications (e.g., Soil Association for the United Kingdom and NOP for the United States), then that was also organized. Once that support was finished, the exporters could choose which certification body they wanted. Some of them switched.

The ICS concept

All the projects supported by EPOPA were certified based on an Internal Control System (ICS). With an ICS, large numbers of farmers can be certified as a group instead of being inspected and certified as individual operations. In order to use this system, certain conditions have to be fulfilled.

In the IFOAM Norms, there are requirements for certification of groups of farmers.

Group Certification

8.3.1 Certification bodies that certify groups that use internal control systems shall have policies and procedures to verify compliance of the group and the individual group members. The policy and procedures shall at least comply with the following criteria.

Scope

8.3.2 The certification body shall limit the scope of such systems to groups that fulfill the following criteria:

- a. the group shall be constituted of operations with similar production systems;
- b. large farming units, processing units and traders shall not be included in the inspection arrangements for such groups and shall be inspected by the certification body in accordance with the requirements of 7.5.2. Simple processing and storage units may be included;
- c. group members shall be in geographic proximity;
- d. the group shall be large enough and have sufficient resources to support a viable internal control system that assures compliance of individual members with production standards in an objective and transparent manner;
- e. the group shall have coordinated marketing.

General Requirements

8.3.3 The policies and procedures for group certification systems shall require that at least:

- a. the certified entity shall be the group as a whole. This means that individual group members may not use the certification independently (by marketing as individual producers outside of the group);
- b. an effective and documented internal control system shall be in place;
Guidance: *The system shall include a documented management structure of the internal control system.*
- c. documented inspections of all group members for compliance with production standards shall be carried out by the internal control system at least annually.

8.3.4 The certification body shall require the management of the group to sign a written contract specifying the responsibilities of the group and of the internal control system. This shall include the requirement that the management obtain signed obligations from all group members to comply with the standards and to permit inspections.

8.3.5 The certification body shall ensure that all group members have access to a copy of the standards or the relevant sections of standards presented in a way adapted to their language and knowledge.

8.3.6 The certification body shall maintain and enforce a set of minimum requirements of the group.

Guidance: *The following are considered essential requirements, although a certification body may list additional requirements:*

- a. *there are competent personnel implementing the internal control system;*
- b. *the core documentation is complete, which includes:*
 - *appropriate maps/sketches,*
 - *a complete list of group members,*
 - *farm/field or processing records,*
 - *signed member agreements,*
 - *yield estimates;*
- c. *the internal inspection protocol is described and implemented;*

- d. a monitored and documented conversion period is in place;
- e. a mechanism to remove non-compliant group members from the list is in place and executed;
- f. there are procedures to accept new members;
- g. risk assessment.

External Inspection by the Certification Body

- 8.3.7** Annual (or more frequent) external inspections of the group shall be carried out by the certification body.
- 8.3.8** The certification body shall assign inspectors who have had specific training on inspection of internal control systems or who can otherwise document competency in such inspection.
- 8.3.9** The inspection visit shall include an assessment of the internal control system, of its effective application and of compliance with the standards.
- 8.3.10** The inspection shall include an assessment of the risks to organic integrity within the group itself and the environment in which it functions.
- 8.3.11** Re-inspection of a sample of group members shall be undertaken to evaluate the effectiveness of the internal control system.
- 8.3.12** The percentage of group members subject to re-inspection shall take into account the results of the risk assessment. The certification body shall specify how it determines the number of group members to be re-inspected.

Guidance: *The IFOAM Accreditation Program accepts the ISO 62 Square root approach, which is based on a simple formula ($x=\sqrt{y}$). The following table is derived from this approach. Note that these are minimum number of re-inspections. Additional inspections may be added and shall be added when necessary.*

<i>Minimum amount of growers to be inspected by external inspectors</i>				
<i>Number of group members</i>	<i>Normal risk factor 1</i>	<i>Medium risk risk factor 1,2</i>	<i>High risk risk factor 1,4</i>	
Minimum	10	12	14	
50	10	12	14	
100	10	12	14	
200	14	17	20	
500	22	27	31	
1000	32	38	44	
2000	45	54	63	
5000	71	85	99	

Certification bodies shall have written rationale for other approaches to calculating re-inspection rate.

Evaluation of the Internal Control System

- 8.3.13** In evaluating the internal control system the certification body shall determine whether:
- a. all internal control documentation is in place;
 - b. internal inspections of all group members have been carried out at least annually;
 - c. new group members are only included after internal inspections, according to procedures agreed with the certification body;
 - d. instances of non-compliance have been dealt with appropriately by the internal control and according to a documented system of sanctions;
 - e. adequate records of inspections have been maintained by the internal control

- system;
f. the group members understand the standards.

8.3.14 Sample inspections (see 8.3.11) shall be carried out with the relevant documents from the internal control at hand, and the methods and results of the internal control shall be compared with the results of the inspection to determine whether the inspections of the internal control system have adequately addressed the compliance of operators. The certification body shall maintain records of sample inspections so as to ensure that over time the inspections are representative of the group as a whole and take into account any previously identified risk.

8.3.15 The evaluation shall include (a) witness audit(s) of internal control inspections.

Group Records

8.3.16 Certification bodies shall have a standardized form to be completed and updated by the group management.

***Guidance:** The form shall include identification, name, location (at least on an area map), year of entrance into the certification system, date of last internal and external inspection, number of hectares, cash crops, and yield estimates; in the case of processor type of processing.*

Responsibility and Sanctions

8.3.17 The certification body shall hold the group as a whole (the certified entity) responsible for compliance of all operators.

8.3.18 The certification body shall have a clear sanctions policy in event of non-compliance by the group and/or its members. Failure of the internal control system to detect and act on non-compliances shall invoke sanctions on the group as a whole. This shall also include provisions for withdrawal of certification from the group where the internal control system has been found to be ineffective.

With the ICS system the job of the certification body is mainly to verify that the ICS is working. It does so by visiting a sample of the individual farms and by auditing the documentation of the ICS, by interviewing the staff, and by comparing the findings of the direct inspections with those of the ICS.

EPOPA developed a sample ICS manual (available for downloading at www.epopa.info) that outlined the system as well as a set of formats for the necessary records to be kept. Based on that manual, the EPOPA consultants and the operator adapted the system to fit the situation. Sometimes this required a lot of work (e.g., for the fisheries), and sometimes it was quite straightforward. However, it is essential that the operator and the responsible staff take ownership of the system rather than just doing what they were told to do. This proved to be quite a challenge.

A larger project would typically have the following staffs involved:

project manager	The person with overall responsibility for the project; can be the general manager or a specially assigned project manager
project supervisor	The member of the field staff responsible for the execution of the ICS
documentation officer	The person in charge of managing the documentation of the ICS (in smaller projects, this could be the project supervisor)
field officer	The internal inspector of the ICS
purchasing officer	The person in charge of buying organic products from the growers

The ICS involves a lot of documentation. A typical project would generate the following records:

Form	Explanation
growers' contract	The contract with the farmers
sub-contractors' agreement	To be signed by all sub-contracted units
growers' entrance form	Gives data at the entry of a new grower
annual questionnaire & farm inspection form	Gives annual data and records the inspections
violation report	Used to report violations/non-conformities
growers' list	Summarizes data from farms
payment voucher	Issued for each delivery by grower. One copy to grower, one kept in buying station
buying records	Summarizes all buying per day per grower. Gives a total of all products bought
irregular delivery report	Used to document situations in which a grower wants to sell more than the yield estimate
interest declaration	For the staff involved in the ICS, to identify possible conflicts of interest
facility registration Form	Used to register stores and processing units and to verify the history
facility declaration	Used for stores and processing units to verify their cleaning
contract for project staff	Signed by all persons involved in the ICS
internal organic standard	Document that "translates" standards and requirements into language understandable by field staff and farmers
annual report to certifier	As required by the certification body

In addition, the ICS should keep staff files with records of training events.

Influencing the certification agenda

The EPOPA projects were among the first to implement a group-certification concept in Africa, and within EPOPA this was further developed in cooperation with the certification bodies. The first was KRAV (Sweden), followed by IMO (Switzerland) and Naturland (Germany). In total, EPOPA probably supported around 15 to 20 per cent of all farmers in the world involved in group certification. Both the European Union and the United States have at times questioned group certification based on internal control systems, and the EPOPA management took action in cooperation with other actors, such as IFOAM. The table below gives an idea of how much certification costs.² Without group certification, the costs would increase by a factor of 4 to 20; in many cases, the cost of certification would equal the total premium price paid to farmers. The actions were successful, and group certification is still an accepted practice.

**Certification Costs in Selected Projects in Uganda and Tanzania
(Data from Season 2005 or 2006; U.S. Dollars)**

Project	Annual organic sales	Farmers	With group certification			With individual certification
			Current certification cost	Cost per farmer	Cost in % of product value	Cost per farmer
1	1,500,000	15,000	25,000	1.67	1.67	22.10
2	89,000	102	3,500	34.31	3.93	135.54
3	600,000	3,600	8,000	2.22	1.33	24.21
4	3,500,000	12,680	18,000	1.42	0.51	22.22
5	93,000	138	3,000	21.74	3.23	109.96
6	2,000,000	468	5,000	10.68	0.25	46.37
Total	7,782,000	31,988	62,500			
Averages				1.95	0.80	23.48

(In-house research, 2007)

The requirements in the EU regulation for organic seeds posed substantial problems for the producers. In Europe, there is a reasonable supply of organic seeds, but not in Africa. When European certification bodies work in Africa, they have a tendency to insist that only organic seeds be used, or that otherwise an exception needed to be demanded, as in Europe. EPOPA commissioned a study on the availability of organic seeds in Tanzania, Uganda, and Zambia. It showed that their availability is extremely limited and that farmers often get seeds through informal exchange. The report (available at www.epopa.info) convinced some certification bodies to adapt their requirements to the realities on the ground.

² The figures don't include the internal costs for the companies to implement the ICS, etc. The actual costs, therefore, for being certified are substantially higher.

Training the EPOPA staff

In order to be able to assist the exporters, EPOPA had to devote considerable effort to training its own staff, as not all of them had much experience with organic certification. Even for those that had, standards and requirements are changing, and the certification bodies have different procedures, so in the end even the more experienced consultants needed regular updates of their knowledge. EPOPA assigned a person to act as a help desk for issues related to certification.

The way to certification

The process for one of the EPOPA exporters is described. The description is intended to give a background to the exporters' way, from the start to set-up of the internal control system to achieve certification.

Certification activities in one export project

1-3 July 2006

ICS training of the company staff. All staff (six men, one woman) involved in the ICS management attended the training session, which basically gave the background to ICS in general and thoroughly looked at the company's ICS manual, which had been developed. There was also a field exercise in which the internal inspection reports were used and discussed.

1-5 August 2006

Internal inspection was carried out after the first harvest. The outcome had good results and only small adjustments were made to the implemented ICS.

October 2006

Farmer training sessions. Six days of farmer training sessions were conducted in the field on introducing the concept of organic agriculture to the farmers and equipping the farmers with knowledge of organic cardamom and vanilla management. A total of 157 farmers attended, of which 121 farmers had already been contracted by the company for the organic project.



20 January 2007

Farmers' meeting. There were 255 farmers attending the meeting, which was conducted at the company estate, where processing takes place. A programme of organic-agriculture practice, an EPOPA marketing update, and general information about the organic project were presented.

19 April 2007

ICS training of the company staff conducted again with staff involved in ICS management.

23-27 April 2007

External inspection carried out. This inspection showed that a group of farmers in one parish along the road were spraying one of the non-export crops, which led to the entire parish's being suspended from the organic project. However, the organic certification for the rest of the project farmers and the estate was granted for the European Union on 8 August 2007 and for the U.S. market on 11 August 2007.

22 June 2007

Farmers' meeting. There were 280 farmers attending the meeting which this time had organic production, HIV/AIDS sensitization and an EPOPA update on the programme.

1 August 2007

Farmer sensitization on HIV/AIDS was conducted with good participation of over 70 farmers in the field.

26-31 October 2007

Fruit-drying training for the company processing staff (four) was carried out.

In the EPOPA programme, more than 30 export companies with a total of 132,000 smallholder farmers and fishermen were involved. Seven of the companies have two crops certified; the others, one. The number of registered farmers per project varies from under a hundred to over 20,000 farmers. The biggest groups are growing crops such as coffee, cocoa, and cotton.

4. Support to national certification bodies and standards

During the end of 2001 and the first half of 2002, the potential for the establishment of organic certification organizations in eastern and southern Africa was assessed in a study by Sida. The strategy recommended was to initiate a regional development programme open to any of the countries in the selected area. Therefore, a project was developed to include support to local certification and inspection capacity within EPOPA.

As part of the project, two entities were set up in Tanzania and Uganda, respectively, for the inspection and certification work. They were initiated and developed in a stakeholder consultation process and resulted in a membership organization in Tanzania, TanCert, and a limited company in Uganda, UgoCert.

The main objective has been to develop the two organizations to be fully operational and internationally recognized. This has been achieved by training inspectors and certification staff as well as building their internal structure and procedures necessary for solid development. By the end of the project in 2008, both organizations were internationally accredited by IOAS, which is a basis for acceptance in the international marketplace.

Currently, their main business is to provide local inspection service to and representation for foreign-based certification bodies. With the accreditation they can gradually get more certification business and thereby take a larger share of the certification market in Uganda and Tanzania. They also offer inspection and certification for other standards than organic.

UgoCert in Uganda is in a strong position, as there is a strong organic sector with rapid growth and good support from the organic sector as well as the governmental institutions. For TanCert in Tanzania, the business situation is not as good due to the smaller organic sector as a whole, but they can still build on the strong support from the stakeholders and also on the good international cooperation that they have built over the project period.

As part of the agreement for certification of the EPOPA-supported companies, IMO and Naturland agreed to use the national certification bodies for most of the inspections. They also participated in some of the inspectors' training sessions. Besides the cooperation with IMO, they cooperate well with other international certification bodies, for which they work as the local inspectorate. They now generate the bulk of their income from sales of services and will be able to finance the remainder from public or donors' funds. Undoubtedly, TanCert and UgoCert will continue their work.

Overall, the existence of these organizations strengthens the sector. The existence of local certification bodies will make the service more accessible to exporters; costs will go down and the understanding of the situation will be

improved, which should mean better service. Local certification bodies are also more likely to be a key actor in the development of the sector at large, which is already seen in the countries. They will also play an important role in the development of local markets, something the foreign-based organizations normally pay little attention to.

First national and then regional standards

EPOPA supported, and provided technical assistance to, the development of national standards in both Tanzania and Uganda. In Tanzania, they were developed by TanCert and in Uganda by NOGAMU and UgoCert jointly.³ EPOPA also initiated East African cooperation in standards, which ultimately (with support from the CBTF⁴ and OSEA⁵ projects) led to the adoption of the public East African Organic Product Standard (EAS 456-2007) by the East African Community (IFOAM 2008).



³ The National Organic Agriculture Movement of Uganda

⁴ The Capacity Building Task Force of UNEP and UNCTAD

⁵ The Organic Standard of East Africa project of UNEP, UNCTAD and IFOAM

5. Study findings

Background to the study

EPOPA's goal was to determine the lessons that can be learnt from the actors in the certification process. EPOPA therefore decided to do an internal evaluation of the certification in EPOPA. The objective was to evaluate the certification in EPOPA, looking into both certification of projects and how different actors have handled the certification. There were in addition these goals:

- to improve the work of the consultants in handling the process
- to advise companies on how to manage the certification process
- to advise certification bodies on how to handle inexperienced clients

Methodology

The methods used in this study are interviews with the exporters, the certification bodies, and EPOPA personnel. Twenty-seven persons were interviewed. Nineteen persons (six managers/CEOs, six project managers/buying officers, three field officers and four farmers) from the exporting companies were interviewed. From the local certification bodies, the two managers and two inspectors were interviewed. From the international certification body, the person responsible for the certification of the EPOPA project was interviewed. In EPOPA, one country manager and two project leaders were interviewed. The set of questions was adopted to the type of group interviewed, but the core issues of certification were the same, and many questions also were the same or similar. In the presentation of the interviews, the answers are anonymous; it is not possible to follow what one interviewed person has answered on different questions. A lot of information was given because of the possibility of being confidential. It is therefore important to protect the sources of information, even if that might make it more difficult for the reader to reach conclusions from the outcome of the interviews.

The interviews were carried out by Eva Mattsson and Norman Mukuru. They took one to two hours. Most were made by Mattsson or Mukuro working alone, but at some both interviewers were present. At some interviews, two persons were interviewed at the same time, but most were done with one person at a time.

Six other exporters got a questionnaire which covered some of the issues which had come up during the interviews. See Annex 2.

The certification decisions taken by the international certification body were also investigated to see whether there were areas where many operators had problems fulfilling the standards. In total, 20 certification decisions were gone through for 12 exporters.

Information and experiences used in this report come also from the author herself, who has been involved in the development of the local certification

bodies UgoCert and TanCert and who had the function of certification back-up in the EPOPA programme and thus became involved whenever there were problems with certification.

How the operator handles certification

The road to becoming an experienced operator

For new exporters, the world of organic certification is often confusing and cumbersome. Many of the exporters had not come across any other certification before. Certification of grower groups for organic production is a complicated system, with many documents, functions and responsibilities for the exporter. It is actually more complicated than the normal individual farm certification.

There seems to be a large gap between the certification bodies' procedures and the new operators' understanding of what is requested where and when. One of the exporters said:

"The start was cumbersome. It is a lot of documentation, really expensive. It is not difficult but time consuming. Today it is routine work, everyone knows more."

"Certification procedures have to be learned; it was not so clear from the start."

The certification bodies said:

"Most operators are surprised of the certification bodies' way of acting and require payment. The operators don't take certification seriously until we explain it."

"Operators often don't understand the system and they should be reminded and that a certification decision will come later."

"When they apply for the first time, we explain the system and they seem to understand, but later they want a certificate immediately."

After some years of certification, the exporter is much more capable of understanding and handling the certification system. They know much more about the whole system. There is a network with both the local and the international certification body and with EPOPA and other consultants. The more experienced ("older") exporters have a dedicated senior person with the main responsibility of handling both the internal and external certification. Sometimes it is the manager or someone just below the manager.

One of the exporters said:

"When the certification decision comes, we already know the outcome of the decision and are acting on it. At the exit interview, we get to know the big things."

It is also clear that the exporter after some time has more confidence in the relation with the certification body. One exporter said:

"The certification manager challenges 'stupid' findings at the exit interview and have also challenged/appealed decisions when needed. The experience of handling certification issues makes it work out well."

The certification bodies also recognize that their system is not always friendly to new operators and that the exporters get a better capacity to handle by time. One of certification bodies said:

“Certification procedures are not friendly to new operators. After two to three years, it works out with an operator. They have learned the system and are stable.”

One exporter has even come to pay the staff extra if the project is certified:

“We pay bonus to staff if the project passes the certification.”

Recommendations:

To the exporter: Assign senior staff to handle the certification. Be active at inspections and exit interviews and about certification decisions in communication with the certification body.

Be very thorough in understanding what is required to fulfil the requirements for certification and what the signing of the contract with the certification body means.

To the certification body: Simplify certification procedures as much as possible. Be very thorough in explaining what is required of the operator and all the steps in the process, including when the various fees are due. Explain everything in writing and orally.

To the consultant: Explain carefully how the certification system works and what is required of a new operator.

Needed but hard work – opinions about certification

In the interviews, all groups were asked their opinion about certification and how it works out. The conclusion from the answers is that there is a good understanding about the role of certification in all groups interviewed, but it is hard work, time-consuming, and an expensive tool with many documents.

The operators have many and strong opinions about certification.

The whole organic thing is very complicated. We have to be dedicated and concentrated to handle the certification. At the start, it was a very expensive exercise with no return as we couldn't sell the product. The EPOPA financing of certification is crucial for private companies.

Is it worth doing it? It is extra work for us and extra work for the farmer.

It is necessary, not really good, but needed, it is cumbersome, we need it, so it is good.

One operator is more desperate and critical. *We are still in conversion, CBs are dictators.*

The operators talk about how difficult it is, but certification is needed for the market access and therefore has to be handled. The interviewed operators are serious in their handling of certification, even if they believe it cumbersome.

The exporters were asked what they would do differently if they could start again today. In the answers, they talk about being better prepared, starting with a smaller group of farmers (the number 600 is mentioned), and designing the ICS system so that it is suitable to the area they are working in. One exporter also said, *“Make a simpler system.”* Another said, *“We would know how to structure our system so it would work well, but something you can’t change. We have to be better prepared.”*

The exporters were also asked what advice they would give to a newcomer in organic certification. There were several interesting and direct statements. Here are some of them:

Certification is a long-term thing. It is costly; the benefits come after some years. Keep your records clean.

Expect a lot of hard work. Have a lot of patience. It takes time to be certified.

The most important is to have good documentation for everything. To have a self-explanatory document, good order of documents. Just don’t prepare documents just before inspection. Read reports and certification decision from the CB.

Go for it! Select the CB carefully and discuss with the CB to see whether it is business-like and efficient. Be clear about the market. You need to be tough. Some of the inspectors do the wrong thing.

Another range of advice came up in the questionnaire:

“Be aware of the high costs of certification.”

“Be aware of the continuous training required for both old and new farmers.”

“The ICS system must be well-established.”

“The field officers must be well-organized in order to deliver services to farmers.”

“Be very keen when developing ICS and employing ICS staff to avoid many non-conformities from certification body and costs.”

Both certification bodies and the exporters also talked about the introduction of a second crop and how to get that into the ICS system. A second crop would, spread out the cost of certification.

One of the certification bodies is also proposing that the exporters consider training more persons than immediately needed. Skills would then remain if one person left.

Recommendations:

To the exporter: The ICS documentation has to be used and should not only be set up for the inspector and certification body. Keep documents and records in good order. Consider training more than one person in the key positions to have a better back-up in case one person leaves the company.

To the certification body: Make the certification system as simple as possible to get the operators to understand and handle the system. Ask for only the

absolutely necessary documents, facts, and figures from the exporter. Make known how your system works and what the exporter shall do.

Use of consultants

Originally the aspiration in EPOPA was that the exporters would be able to handle certification by themselves after three years of support. In reality, this type of assistance is still required. After EPOPA support ended, some of the exporters have continued to use a consultant to handle the certification and the documents needed, such as a grower lists and ICS manuals. In some cases, the exporter is also letting the consultant be present at the external inspection to represent the exporter.

“We use a consultant. We need someone for follow up and support, someone who can tell us were we go wrong, and we need to know that beforehand.”

In several cases, the person who was the EPOPA project leader later becomes the consultant for the company. Also, in other places in the world there are consultants helping producers with their organic certification so it can be seen as a normal business decision to hire a consultant when the exporter is not able to handle its system. Consultants can assist with different aspects of running the company. If so, it is often just a matter of a couple of days or some phone consultations.

One of the certification bodies says that they recommend that new operators use a consultant. *“We recommend those to get a consultant. The operators that refuse to use a consultant are the biggest problem.”*

Recommendations:

To the exporter: Use a consultant for support in certification issues if there is not enough capacity in the company and there are qualified consultants available.

To the consultant: Ensure that you are qualified to support the operator in certification issues. Keep up to date with certification issues.

Documentation

The requirements for documentation and the amount of documents are a concern. It is said in many of the interviews that there is much (and maybe too much) documentation.

Two of the farmers said:

"You must keep a file of records that may be needed by visitors."

"It would be better if the farmers could fill forms once. Record-keeping is a new thing and difficult to those farmers who cannot read and write."

One of the EPOPA project leaders said:

"It is a lot of documents, they are needed for the ICS but the international certification body has forms for everything and overloaded people with forms."

The exporters fill in:

"It is extremely particular about documentation. Everything has to be recorded."

"There is a lot of documentation, own documents, CB documents, just to handle 18,000 farmers in Excel files is a problem."

"Certifiers are too demanding as this is evidenced by the number of documents required to obtain a certificate."

The field officers are also concerned about the amount of documents:

"Bulky documents to keep that some times it's hard to find a particular document when needed by external inspectors."

Also one of the certification bodies are questioning the amount of documents:

"I would love a simpler way of inspection/certification. It is nine forms only for EU+NOP certification. This makes costs."

But the ICS document is also seen as valuable tool not only for certification by one of the exporters. *"The ICS manual is fine and we use it for everything, handling staff, quality issues, etc."*

"We have been able to computerise the ICS and this has helped in improving on the documentation."

The conclusion of all these statements is that everyone is concerned about the amount of the documentation requested in the ICS systems and the burden it brings. Entering into certification is for many producers also entering into more documents and more documentation. For the smallholder farmers there has never before been any need for maps or documentation of the number of fields or, for example, coffee trees. Many exporters had little documentation of the product flow before organic certification. In certification, there is an absolute need to follow the production and product flow, but there is also a balance between the amount of documentation and the ability of the producer to keep the system functioning. One example is maps. A map where farmers and organic fields are located is a prerequisite in organic certification. But would

maps also be requested for other crops possibly located in other places? Would rotating communal or family land have to be included or neighbours' fields were chemical pesticides are used? If all this is included, it will put a heavy burden on the ICS system and take time from other activities. If the same crop is grown on both organic and conventional land, this is probably needed, but if coffee is the certified crop and beans and corn are the crops on other land it is not worth including those in the map for certification.

All involved (and especially the certification bodies) should strive to request only the absolutely essential information. They should also make information known and be clear and concise on what kind of documentation is needed in the ICS system. Only facts and figures absolutely essential for the verification of compliance to the standards and certification requirements should be requested from the exporters. The number of documents should be kept down. For example, it is probably easier for the exporter to get all conditions for the ICS group in one document, instead of having three different documents as the group is certified to three different standards by the same certification body. Notably in some cases it is authorities and accreditation bodies that insist on some of the things making the system complex.

Another concern about the documents requested raised both by the certification bodies and EPOPA is that the ICS document and growers list is normally updated only around the inspection visit. The conclusion can be that the exporters update the documents "for" the inspector/certification body before the annual inspection visit but don't use them so much in their daily work. This problem is shared with other types of certification. One solution is for the certification system to do unannounced inspection visits. This is a possibility if there is a local inspector or certification body but less of a possibility if the inspector is going to fly into the country. Another solution is that the exporter understands the need of active use of the ICS system and also uses it for the management of the company and product flow.

A further problem area in documentation is the use of computers and the lack of skill to handle them. To keep control over the large number of farmers in the groups, Excel lists are often used. It is also natural to have the ICS document and several forms computerized, but there is a lack of both competence and data security; back-ups are seldom made and computer viruses are common, which can put the whole ICS system at risk. It is obviously the responsibility of the operator to ensure this, but surprisingly the certification bodies don't seem interested in these issues, even if a failure could lead to a collapse of the whole system and thereby pose a much bigger risk than many of the things that currently are noted as non-conformities.

Recommendations:

To the exporter: Be rigorous with the ICS documentation. Train personnel to be competent with computers and programmes. Ensure that it is seen as something that needs to work properly at any given time and not only at the time of inspection.

To the certification body: Only request the absolutely essential information and documentation from the exporter. Highlight when needed the issue of computer competence and computer security. Consider unannounced inspection to check on the ICS system at irregular times.⁶

To the consultant: Support the exporter in the development of documentation (but the ownership of the documents has to be with the exporter).

Highlight when needed the issue of computer competence and computer security.

Communication and gaps in communication

To get the certification of group system to function, much communication takes place. In the questionnaire, the exporters said that they had on average 17 contacts a year about certification. The contacts are with the international certification body, with the local certification body, with the inspector, and with EPOPA. The exporters answering the questionnaire have been certified for several years and have a well developed contact net. For the more inexperienced exporters, there is often resistance to contact a certification body far away. Several exporters say that they appreciate the contacts with the local certification bodies, which are closer and also know the local conditions better.

The operators state that they want a quick response from the certification bodies and that they also get it. The information they get is about standards and certification issues.

"I would love to get more information from the CB. How does the certification system work?"

"We mostly communicate with the local certification body. We would need more information, more facts around the process."

Through different EPOPA activities, representatives of the international certification bodies have taken the opportunity to meet exporters when visiting Uganda and Tanzania and also at meetings at BioFach. This has helped to build relationships between the international certification body and the exporters.

There is a general problem in the style of communication between the certification body and the operator, which the author has experienced in several cases. The certification body designs the structure of the certification year with, for example, applications, invoices, inspections and certification decisions. The operator has to fulfil their role in sending in information, paying invoices, receiving inspectors, etc. The certification body expects the operator to fulfil its "role", and if the operator for some reason doesn't manage what it is requested to do, the operator would react, call, write, or complain to the certification body. Sometimes the certification body is good in informing about its actions

⁶ It should be noted that for individual farm certification unannounced inspections are rather common in certification bodies home countries at least. However in group certification it is rarely carried out, even if the contractual arrangements allows the certification body to do so. The two main reasons are costs and the problem to organise unannounced inspection of such complex systems (if the person in charge is not available it will be hard to make a good evaluation of the system. An alternative is visits on a short notice.

during a year, but sometimes it is quite difficult for the exporter to understand what should be done and what the outcome will be if something is not done. What is the consequence of an invoice which is not paid in time? Is the certificate withheld, or is it just a reminder from the certification body that there is an invoice outstanding?

On the other hand, the operator sometimes uses the strategy to leave a problematic issue and hope it will go away in time. This way of acting often works very badly as certification problems like non-conformities don't go away but might be laid aside by the certification body for quite some time. What often happens is that "suddenly" a problem pops up again, often at the time the produce should be sold and exported. From the interviews, it was clear that the more experienced exporters were aware of the need to quickly react to communication from the certification body, investigate issues, and communicate with the certification body to avoid "explosions" later.

Another issue is how much it is possible for the exporter to negotiate with the certification body. There are general statements that there are more things which can be negotiated in East Africa than in Europe. Looking from the certification side and for one having knowledge in the procedures of a certain certification body, it is possible to negotiate on a range of issues when there are special problems for the exporter like the timing of the inspection when the person in charge is travelling abroad or when liquidity is low and an invoice has to be paid. This is of course not possible in all cases, but in the normal dealing between the two parties there are a number of issues. For an operator unfamiliar with the procedures of the certification body, negotiations are often done on the wrong issue or at the wrong time. For all actions regarding certification (not only the negotiations), it is important to know what should be done when. Three of the exporters said the following:

"It is important to know when to be active in the certification year."

"It is key to follow the project crop year and make a plan for it."

"Follow up so that the project is doing what it should at the right time."

Recommendations:

To the exporter: Build up and maintain contact with inspectors, the local certification body and the international certification body. Don't be afraid to contact someone with a question even if he or she is far away in another country. Learn when different things shall be done and what the possibilities are for adjusting the formal requirements to the realities on the ground.

To the certification body: Be simple and clear when explaining your system. Try to foresee when things can go wrong in the certification cycle and try to intervene to avoid these problems. Be open and flexible and try to find solutions to problems.

To the consultant: Build up contact with inspectors, the local certification body, and the international certification body. Guide the exporter through the steps of certification.

Costs of certification

Money and payments

In the interviews, many state that the cost for certification is high and too high, but there is also a change over time. In the first years, when no production is sold as organic or when sales are still low, the certification cost is seen as “mighty expensive”. For the “older” exporters which sell larger amounts of organic products, the certification cost is seen as something acceptable as a fee to access the required market.

“Cost is high. This is made worse by ineffective farmers who fail to deliver. Those new companies that are starting with a high number of farmers are losing out greatly, since they cannot sell their products as organic yet the inspection cost is computed as a percentage of contracted farmers.”

“Today when exporting good amounts it [the cost of certification] is insignificant, but the cost is unfair to small operators.”

Another issue is the cost of including smallholders in the group and by that in certification. If these smallholders don't deliver their organic products to the project, they are just an extra burden in the ICS system. Most exporters contract a higher number of smallholder farmers who deliver part of their production rather than a lower number of really dedicated farmers delivering all their produce. To have a larger number is felt to give better security in getting the amount of products, but it is also generates higher costs for running the ICS and being certified.

There have been some disputes about payments of invoices for the inspection and certification, especially for new operators and delayed payments. There is a signed contract, and together with the contract an explanation of the way in which fees should be paid is normally included. The international certification body is requesting a payment of between 50 per cent and 80 per cent of the total fee before the inspection and certification are done. The reason is that there is always a risk that a negative result of an inspection will lead to the operator not paying, and the certification body will make a loss, which then has to be put on the general fee-level. From the exporters' point of view, it can be difficult to pay a long time before the crop is sold and there is no income from the organic production.

Some of the reflections from the certification bodies are:

“Most operators are surprised of the certification bodies' way of acting and require payment. The operators don't take certification seriously until we explain it.”

“Some operators try to pay less than agreed. We don't move until 70 per cent of the fee is paid.”

An example of a typical invoice can be found in Annex 3.

Recommendations:

To the exporter: Before signing the contract with the certification body, investigate which fees there are, when they should be paid, and what happens when they are not paid on time. Pay invoices on time. You do not pay a certification body for a positive decision; you pay for a service.

To the international certification body: Inform thoroughly about all fees, when they should be paid, and the consequences of late or unpaid invoices.

To the consultant: Support the exporter in understanding the fee system of the certification body.

Time is also a cost

In the beginning of the organic projects, it seems as if many of the exporters don't specifically identify the time spent to handle certification as a cost, while the more experienced exporters do so and often see it as a high internal cost. In the financial analyses EPOPA has done, the cost of the external certification is less than or equal to the cost of the internal control system.

"The sum paid to the CB for certification is nothing compared to the cost of the internal work."

In the interviews, questions were asked about the time the different parties spent on certification issues. The answers vary largely, and to get a better picture it would need a more thorough investigation and more standardized questions and measuring. Nonetheless, a conclusion can be drawn: much time is spent on getting the group certification systems working. The field officers say that between 70 to 90 per cent of their time is used for certification issues, so there is not much time left for training farmers. Two of the exporter managers said that they use two to four days a year; three of the persons responsible for certification at the exporters said that they use 70 to 90 per cent of their time; another said three months a year.

Recommendations:

To the exporter: Count both time for the staff and certifier fees as a cost for certification and include this sum as a cost for market access for organic products. Manage your field staff efficiently.

To the certification body: Don't request that the operators have time-consuming procedures if the procedures are not absolutely essential.

To the consultant: Support the exporter in having smooth and efficient procedures for the staff and for handling the ICS system. Ensure that things are done on time.

EPOPA support to the exporters

Too much or too little support

The EPOPA project leaders said that they want to support the exporters well regarding certification. There is both the wish to do more and have more time for the certification and at the same time a fear of doing too much, too much pampering, and too much time spent on certification instead of other support tasks. At the same time, one of the project leaders said that the exporters are happy to get all the support they can get.

“To answer the question if EPOPA has done too much or too little, the answer is both yes and no. We should have pushed more. There is a close relation between the operator and the project leader.”

“There is a mismatch in the expectations from the company and what EPOPA can do.”

The EPOPA consultants have also learned a lot through the years of working with the exporters. They were not employed because of their superior certification knowledge, but they had a good knowledge of a range of issues. They have made the same “trip” as the exporters of learning how to handle certification and building up a network of informal and formal contacts with the key persons of both the national and international certification bodies.

Recommendations:

To the consultant: Be aware that too much support may make the exporter too dependent on the consultant. The goal is to make the client capable of handling the system and problems themselves.

What is the operators' opinion of EPOPA?

When discussing what the exporters think about the EPOPA support, it is important to remember that interviewers are from EPOPA and therefore it could be the case that criticism is difficult to bring forward.

In general, the exporters said that they are very positive about the support about certification that they got from EPOPA. The EPOPA consultant/project leader is seen as a supporter and helper.

“It is very good. Dedicated staff which are easy available and have time to deal with my problems and every aspect of my business.”

“We are very thankful to our EPOPA project leader. First years we were small, and it was difficult without EPOPA support. Too little business for too much expense.”

“When we were young and weak, EPOPA helped us. Now we can handle it ourselves.”

“We really, really appreciate the support we have received from EPOPA.”

There are also several statements about useful training sessions on topics like computers and inspection. Some also said that they want more and longer certification support from EPOPA.

The field officers are also very positive about EPOPA guidance in handling the ICS system and training sessions, setting up demonstrations, and providing promotional material.

But there are also more critical statements. *“EPOPA should have emphasized how complex the certification process is and should have continued the support, as continuous support is needed for smaller, cooperative societies.”*

Recommendations:

To the exporter: Use the consultants as a resource, but be sure of being capable of handling the system yourself, or hire the consultant for the longer term.

What do the certification bodies think of EPOPA's support to the exporters?

Both good and bad

The certification bodies said that EPOPA operators are much better prepared than other operators.

“It is not possible to handle such a big project in Africa without a consultant/support. Only a few of the companies had made it through certification without EPOPA.”

“The operators which come through EPOPA are prepared; the non-EPOPA operators are totally unprepared.”

The certification bodies also fear that when EPOPA ends it will be difficult for the operators to handle the system.

“For some operators, EPOPA has done too much. All documents are developed by EPOPA, and when EPOPA withdraws the project, cannot manage to handle the certification of the project. EPOPA should do more guiding than doing/managing the documents. At inspection, the consultant is still sitting on the docs.”

The certification bodies are the most critical group regarding how EPOPA has supported the operators and how well the EPOPA project leaders have managed the certification.

“EPOPA PLs were not experienced in ICS and certification. Not knowing the EU regulation.”

“The certification conditions for one of the exporters were not well understood by the EPOPA consultant. The documents look fine, but the content sometimes fails. Some exporters have documents which are a mess.”

–“It would be better to have a more risk-based approach, not to pressure the company to develop so detailed and many documents. The result now is that they are not in the field and do what they should do.”

The international certification body also talked about the two-sided issue of non-functioning projects and the pressure from EPOPA to get them certified:

“Some projects were a disappointment. Even if they had EPOPA support, nothing was in place, and at the same time we had a pressure from EPOPA to get projects certified.”

Recommendations:

To the exporter: Be well-prepared and use a consultant if there is not enough capacity among the personnel in handling the certification.

For some exporters, an option is to outsource the ICS or parts of it to an external organization.

To the consultant: The consultant should use a risk-based approach when training the exporter, field staff, and farmers. In the consultancy to the exporter, it is important to get the exporter to be in charge of the system.

What do the exporters and the consultants think of the certification bodies?

Information and communication

Much of the information seems to be transmitted by the inspector to the operator and less is in written format. From the certification body's side, it is probably felt that written information is not read. It would still be good to generate simple written information to the operator about the certification year, how to handle non-conformities, how to appeal a decision, and how to change the certification body.

When asking about the service from the certification body to the exporter, there were these statements of appreciation:

"The international certification body is effective."

"Advice is always given on environment, human-welfare-related issues and marketing."

There are also comments comparing information received from one international certification body with the other.

"The communication with X works much better compared with Y. In general not so much communication with the CBs."

"If there is any problem with X, we can always talk with the local certification body. For Y, we talked to them directly and they respond quickly and we get an accurate reply. Issues with X go over the local certification body, and that takes more time."

Recommendations:

To the exporter: Ask the inspector and the certification body when something is not clear. Read through information sent from the certification body.

To the certification body: Inform the operators both orally and in written form. Make thorough but simple information documents. Use clear, straightforward language. Train and update inspectors very well on your system and changes in the standards and certification system. Try to foresee coming problems and tell the operators beforehand what they need to know. Be quick to answer operators' questions. If you are using a local certification body as inspectors, they will do a better job if they are well-informed.

To the consultant: Push the exporter to ask about unclear areas and to read the information from the certification body. As a consultant, find out things before you give advice so that you give the right advice.

Inspectors and inspection visits

In a system in which the international certification body is far away both in distance and sometimes also in knowledge of the local conditions, the inspector will play a more important role than when the certification body is based in the same country as the production. The inspector many times functions as the source of information to the project and the staff of the project.

There were quite a few statements of appreciation of the inspectors:

"The inspector has been very polite with the farmers and field officers. The inspectors have never been rude with us, and also guide us well."

"The inspectors have almost always been polite. Some of the local inspectors are fantastic."

The problems with inspectors without knowledge of local conditions were brought up several times. The exporters said:

"We have got inspectors which are new to Africa and it is hard to explain to them. The shift in inspectors gives us a rough ride as the new inspector came up with new things and was not happy with our ICS document."

"We want experienced inspectors who know local conditions. Now we get a local inspector, and that is much better."

There are also comments on how professional inspectors are; this is both the knowledge of the inspector and how the inspector treats the ones he inspects. One of the certification bodies said:

"There have been complaints of different kinds. The inspector does not know what they should check, they mess up the management of the operators, don't know the EU regulation, etc. There have also been complaints on arrogant behaviour. The attitude of the inspector is important."

Another certification body underlined the importance of how to treat the operator:

"It is important to approach farmers in a nice way, not acting as a policeman. Talking to the head of the household in front of the whole family."

One of the experienced local inspectors said:

"A general advice to new inspectors is to be careful with operators. The operators have invested a lot of money and efforts in their organic system."

Another area mentioned is the problem when the inspector addresses issues which are not covered in the standard and they are reporting on these as non-conformities or at least recommendations. One classic example is the discussion

about the wages of field officers and whether they should have bicycles or motorbikes. Motorbikes make transport easier for the field officer, but they are more costly, and there is a risk of accident. From a certification point of view, the important issue is that all internal inspections and other tasks are done in a satisfactory way. With a motorbike, there is more time, but for the same money it may be possible to employ an extra person.

The exporters have some examples of issues brought up by the inspectors:

“Mainly good, but sometimes details which is not felt to be in the scope of inspection. One example is the proposal, “Why don’t you buy your field officers rain jackets?”

The CB should not bring up details but look into the big picture.”

Many of the operators interviewed have had good experiences of inspection visits and good cooperation with their inspectors while there are also some statements about problems. It seems like the inspectors sometimes have been tough especially to the field officers who almost always is the one guiding, the external inspector in the field. One field officer said:

“It created tension in the earlier years though the situation seems to improve now. The inspectors were rather tough on the field officers if things were not in order and there was fear of losing out on obtaining certification.”

And an exporter said:

“All inspectors are similar in approach irrespective of the CB that sends them. Tough and feared by field officers. During exit meetings, they offer recommendations that are not applicable sometimes. We have signed documents directly at inspection without really knowing what is in the report, but what happens if you don’t do it?”

The signing of an inspection report at the end of an inspection is a procedure which has led to discussion and disputes. It is introduced in the EU regulation for organic production as a way for the inspected operator to approve the documented findings at the inspection visit. In Europe, a report can be left at the farm and sent back by mail, but in East Africa, where there is less communication and mail, the report is often signed at the end of the inspection with little time for the operator to read through or oppose the findings. There have been cases in which operators claim they have signed a blank report.

Recommendations:

To the certification body: Use inspectors with knowledge of local conditions. Train inspectors to be respectful to and well-behaved with the operator and the field officers. Don’t force the operator to sign the inspection report without giving time for the operator to read through and understand the report.

Certification body personnel

It is not only the inspector who needs local knowledge. The personnel at the certification body need to know about the conditions in the country. As it probably is not possible to have detailed knowledge for a person handling

certification in a bigger number of countries, a humble and modest approach helps.

One example of when the certification body personnel do not understand the local conditions and over-interpret the EU regulation is when it is said in an inspection report that the manure used is coming from around 10 cows which lack access to grazing. At the international inspection office this is interpreted that the manure comes from “factory farming” and they gave the exporter a non-conformity about using the manure from those cows. In reality, the cows were outside in a paddock with a roof and got fresh fodder from the farm. A local certification body would know that cows are outdoors in these very common systems. A certification body with good knowledge of how the EU regulation is interpreted would have known that the term *factory farming* is mainly used for manure from the worst and biggest forms of conventional animal husbandry like battery hens and broilers – not from 10 cows, whatever system they are kept in.



Factory farming?

Recommendations:

To the exporter: Request explanations when “strange” certification decisions occur; appeal decisions when needed.

To the certification body: Use personnel who have knowledge of the conditions in the country. Train personnel to take an interest in finding out what the local conditions are before deciding on non-conformities. Train inspectors to make clear reports where it is possible for the certification body personnel to understand local conditions.

To the consultant: Support the exporter in asking for explanations of “strange” certification decisions and in appeals.

Several certification bodies involved in the certification

The certification body construction

In the EPOPA project, the consortium of IMO and Naturland was contracted to do all certification for the full EPOPA projects during the three years of project support to the exporters. In the first year, certification was funded entirely by EPOPA. In the second year, half was paid by the exporter and half by EPOPA. In the third year, the full cost was borne by the exporter. It was also decided by EPOPA that exporters should be certified both to the regulation for the country or region intended for export (most commonly, the EU regulation) and to private standards (like the Naturland standard) to get products accepted by all IFOAM-accredited certification bodies. In practice, IMO was handling all documents and inspections of the exporters.

Cooperation between the local body and the international certification body

Both the international and the local certification bodies were in a way forced to collaborate with each other, but the certification of EPOPA projects involved many valuable clients and offered the possibility of gaining experience.

“We could not have done all the inspection alone without the local CBs,” said the representative of the international certification body. *“The cooperation was good; we got training, which we appreciated. We got work,”* says one of the local bodies. But there were also quite a bit of murmuring, bad communication, and problems.

One of the international certification bodies was active in East Africa before it started to do certification of the export projects in EPOPA. The certification body made it clear that it did want to continue in the region and not hand over all their clients to the two new local certification bodies. That is an understandable business decision, but it nevertheless created some tension between them and their local partners. One of the local certification bodies said, *“The international CB did not want to support the development of us (the local CB). I would have liked to work with a CB that wanted the development of a local CB, but we have found a way.”*

The international certification body said, *“I liked the cooperation, but it was difficult, as one of the local certification bodies were promoting another international certification body. This did not give us trust in the local certification body as we were promoting their build up and then they cooperate with one of our competitors. With the other local certification body, we had a very good cooperation.”*

There are many things which can go wrong in collaborations in which the partners are unequal and the distances (in kilometres and culture) large.

Sometimes it was unclear whom the inspector at the local certification body got instructions from and reported to. This was sorted out by amending the working procedures between the local and the international certification body.

Another problem with having one local and one international certification body is that it was one more step in the chain of handling inspection reports and getting them finalized. One of the EPOPA project leaders said, *"To use one local CB for inspection and one international CB (for certification) always give a lag."* One of the certification bodies said, *"It gives more problems with whom to inform the operator and for example to decide inspection dates."*

The communication between three parties (exporter, certification body, and EPOPA) instead of the usual two has led to all kinds of misunderstandings and shortcomings in information. One of the EPOPA project leaders said, *"There has not been any info to us from the CB; it is sent to the company. I have not got any information about the certification year (what is done when by the CB)"*.

From the certification body's perspective, it has informed its client (the exporter) and assumes that the exporter then informs its consultant. To get the collaboration to function well, all three parties have invested time and resources. The international certification body said:

"We would have needed some more time and resources for training the local certification bodies. That would have given a more constructive training and cooperation. Now much was improvised."

In the end, after knowing each other better, and having handled and sorted out problems, there is, as can be seen in several of the statements in this chapter, an acceptance of each other. The collaboration worked out quite well. There is also an understanding that without the other party it would not have worked out.

But there are cracks because of the uneven relationship between the two. One of the local certification bodies said, *"Inspections have worked out. The problem with the international certification body is that they don't trust us."*

Recommendations:

To the national and international certification body: For the collaboration between certification bodies to function, you will have to invest time and resources.

More certification problems encountered

Respect one another and problems are solved more easily

Respect for one another is important and has many times grown through the years of cooperation in certification. The understanding of each other's roles and problems has helped to create respect for the other. This has not always been the case. One of the project leaders said, *"Some of us have complained too much about the international certification body."*

One of the international certification bodies said:

"In the start, one of the EPOPA higher management was very negative to us. But that changed, so that we later had a good cooperation."

Quite often there are respectful conversations, but there are occasions when things go wrong. This is taken from an e-mail discussion about non-conformities and written by a person from an international certification body. The issue discussed is the use of a farm input which has been used on the farms. The exporter has managed to get the information that the input is certified by an international, non-European, IFOAM-accredited certification body. This doesn't mean that the product is directly approved in the European Union but that the products would be accepted. The exporter has answered in a polite and normal tone. The statement by the certification body in an e-mail conversation has a different style. It is written without respect to the exporter and is grammatically incorrect:

"WE CAN NOT PERMIT THE FURTHER USE OF THE PRODUCT UNTIL THE REQUESTED INFORMATION IS NOT AVAILABLE. PLEASE STOP USING THE PRODUCT IMMEDIATELY UNTIL INGREDIENTS ARE 100% CLARIFIED AND GMO IS AVAILABLE.
Please confirm the last point (by email is enough)."

Getting back to a trusting relationship after this kind of communication will probably be very difficult.

Here is an interesting statement by one of the EPOPA project leaders on how the struggle to get production certified has been working out:

-"The international certification body makes the problem for you but then they help you to solve it."

And one more:

"The responsible person at the international CB sorted many things out, but she needed to know the issues and the exporters are reluctant to talk directly to the international CB."

Sometimes things go wrong through no fault of either the exporter or the certification body. An example of problems encountered is when one of the exporters is to do a first shipment of products. For conventional shipments, a fumigation certificate (a document stating that the product has been treated with chemical pesticides against insects) is required. To get a smooth way out of the country, a fumigation certificate was issued also for the organic crop, even if fumigation was never done on the exported produce, and the document was sent together with the other needed documents. Everything went well until the documentation, including the fumigation certificate, arrived on the desk of the import authorities in one of the European countries. It took much effort to explain what had happened. In the end, it was sorted out, and luckily it was a product which could be stored for some time. With a product with a shorter

lifespan the product would have been lost. For the exporter, there was a cost, as the product was kept in the port until problems were sorted out.

Recommendations:

To the exporter: Be open-minded and solve problems whenever possible. Treat inspectors and certification bodies in a respectful way. If they treat you badly, speak up; make a complaint to the certification body.

To the certification body: Be open-minded and solve problems. Treat your operators with respect. Also, bad issues can be handled in a respectful way.

To the consultant: Be open-minded and solve problems. Treat operators, inspectors, and certification bodies with respect.

Certifying to international standards in Africa

In the EPOPA project, the main standard certified to is the EU regulation for organic production (EEG 2092/91). There have also been products certified to the U.S. and Japanese regulations for organic production.

The international certification body wants of course to guarantee market access of the products as a good service provider. Their customer would not continue to use its services if in the end products don't get accepted in the European Union. Therefore they don't want to have anything stopping the product, and therefore the interpretation of the standard is strict. There are no official, standard interpretations in Europe; the certification body has to make the interpretation itself. It is well-known that the import authorities in the European countries differ in their interpretation of the EU regulation for organic production.

For example, the certification bodies often require buffer zones when a neighbouring field is sprayed with chemical pesticides. Requirements are more frequent and strict in the EPOPA projects than in many areas in Europe where chemicals are used. Another difference is that knapsack sprayers are used in Uganda and Tanzania, while in Europe it is tractor-driven sprayers. The EU regulation does not request buffer zones to sprayed fields. To get a more uniform interpretation in this area EPOPA made an internal guideline for buffer zones based on major standards, regulations and their interpretations.

Recommendations:

To the exporter: Try to find out how a standard is interpreted in the main area. Always request the certification body to refer to a standards paragraph when raising an issue.

To the certification body: Keep up-to-date on how a standard or regulation is interpreted in the main area of use. If there is a possibility for equivalence in standards fulfilment for production (for example, in East Africa), use it.

Switching from one certification body to another

Some of the exporters have, after the EPOPA support finished, changed certification body. This has sometimes led to problems. On the one hand, it can be expected that a professional exporter understands when a contract can be renegotiated and when it can be ended; on the other, it is not likely that the certification body has informed them well about how to leave and go to another. There has also been an expressed fear that the exporter will lose its certification status and therefore not be able to sell any organic products when changing to another certification body.

“Shifting certification body has helped us a lot. We found a more effective certification body. Certifier X was very good, did advocacy, but pulled out. The Certifier X handover was smooth. Certifier Y was slow, inflexible, slow at responding, and not so much clarity. The shifting was a nightmare. Certifier Y didn’t want to cooperate with Certifier Z. Certifier Y made it difficult and had no business service and wanted to blacklist us.”

The reasons for an exporter to change certification body can be several. The two most common are probably costs and service, but there can also be rather personal reasons of liking one better than the other. Some of the exporters wish to use the local certification bodies. Finally, some exporters may change certification body because they are not happy with the outcome of the certification process, e.g., they may think that some non-conformities are not fair. In the worst scenario, they change certification body because they are about to lose the certification status and hope that another one will be more lenient. Such behaviour is facilitated by the fact that many certification bodies are reluctant to share information with other certification bodies, even when they are obliged to do so under the EU regulation, for example.

A European certification body started to cooperate with first one and then the other of the local certification bodies. This was not included in the EPOPA project but was evidence that the local certification bodies were seen as possible partners also for other international certification bodies. The local certification bodies are very positive about the cooperation with their new partner, which was found to be more on an equal basis than the previous one, in which local certification bodies functioned mainly as inspectors. The local certification bodies said the following:

“The new certification body have made it different in agreement and conditions. They pay a flat fee for the certification. It is better and higher.”

“The cooperation with the new certification body have been totally different. It is based on understanding and treat us as a certification company.”

“The new certification body copy us all communication with the operator; the previous don’t.”

Recommendations:

To the exporter: Compare the offers from different certification bodies, but be clear that a change of certification body can be a cumbersome process. Also realize that the cheapest offer is not always the best.

Switch certification bodies at the time of the certification year when the contract is expiring. Fulfil the requirements needed to be able to leave a certification body (for example, pay for the cost for certification).

To the certification body: Treat your partners as equals, and the cooperation will likely work out better. Inform the operator on how to change to another certification body and be supportive to operators that want to switch certification bodies. Cooperate with the “receiving” certification body by transfer of relevant files, including pending non-conformities.

To the consultant: Support the exporter in selecting the certification body and in switching certification bodies.

Timing of external inspections

One international certification body has a system for the certification cycle over the year, which leads to problem. The calendar year is the same as the certification year and the exporter has to first fulfil all internal inspections and finalize the growers’ list before the external inspection can be done. This leads to the inspection often being done in the second half of the year. One of the exporters said:

“The inspection and certification is just linked to the buying season. The inspector always comes when there is most to do.”

Doing the external inspection at the same time every year is not so good for several reasons. First, there is only one part of the production year seen; second, the buying season is a very busy time for the exporter, and for the local inspectors all inspections are in one part of the year (resulting in overload of work in that period and not enough work during the rest of the year). In addition, the exporters may sometimes be without a valid certificate through this system. However, in order to allow for inspection to be more spread out, the exporters must have their system in shape throughout the year.

Another reason for inspections at the end of the year is that the exporter delays the inspection because it is too busy with other tasks or its system is not ready for inspection. Certification bodies are sometimes put in very difficult situations because of listening “too much” to the exporter’s problems, causing delays.

Recommendations:

To the exporter: If the certification body wants to do the inspection at an inconvenient time, accept it once in a while but also ask it to do the inspection at other times.

To the certification body: Vary the time of external inspections so that they are done at different times of the year.

Double certification

The problem of having smallholder farmers registered with more than one exporter has occurred in some areas. The smallholder farmers are not certified in their own right and can't sell their product to anyone else as organic. The exporter carries the certificate for the crop. If a smallholder farmer is contracted with two exporters who use different certification bodies, the risk arises of cheating by selling the crop twice and earning extra money. Smallholder farmers with contracts with two organic exporters may have a better chance of selling the product for a good price or under better conditions (e.g., less stringent quality requirements; provision of credits, etc.). If one exporter/buyer is paying too little, the other might pay more (even if this seldom happens).

For the exporter, it can be difficult to know whether a certain farmer has a contract with another exporter, and farmers often pretend not to know. It can also be tempting to take over already trained farmers instead of starting training from scratch. The farmers are already organic and trained in quality; the investment is much less.

One of the exporters said:

"We sanction farmers that are also registered with other operators. We don't want to have the risk of double certification and by that the risk of selling conventional products."

If there is only one certification body active in an area, then double certification can be sorted out, but not without much effort. Problems arise when different certification bodies don't want to communicate with each other. One solution used in parts of Uganda is zoning, allowing different exporters to recruit farmers in different areas. That takes away the possibility of the small farmer having a choice of where to deliver.

Recommendations:

To the exporter: Try to work in areas where the farmers are not certified by another certification body. Ask farmers to declare whether they are certified by another certification body. Work intensively with your farmers. Build up loyalty; make farmers and their communities appreciate the assistance provided by your field officers.

To the certification body: Do not make it easy for less serious buyers to take over already organic farmers from their competitors. Contact other certification bodies to find out whether they are already active in the area. When it happens, cooperate with the other certification bodies active in the same area to address double certification.

The hard life of the field officer

The working conditions for the field officers are quite often tough. They bring up the problem of having too many farmers to handle.

“Farmer – field officer ratio is high. For example, one officer works with 1,600 farmers.”

Also one exporter mentions that the farmer/field officer ratio is very high. Handling 1,600 farmers is not possible for one field officer if there is to be any quality in the work performed. It means that they would be inspecting five farmers a day, six days a week, every week of the year. On the field officers’ plate are many other tasks like training of farmers and often being present when farmers are delivering their products. In the EPOPA export projects, the normal number of farmers for a field officer is 200 to 600.

The field officers also have other issues which they find hard:

“Lack of funding or limited funding for demonstrations to farmers hinders knowledge dissemination.”

“Low salaries are a de-motivating factor to effectively serve farmers.”

They also suggest that EPOPA advise the company management on the welfare of staff, and they add that EPOPA played a great role in terms of salary support to field officers.

Recommendations:

To the exporter: Field officers need a decent workload, regular payment, and perhaps a bonus for good work.

To the certification body: React if the field officers have too high a workload. Check out the quality of their work. How have they managed to do the farm inspections? What is the quality of the internal inspection reports?

To the consultant: Support the exporter in developing a functional internal control system, including a decent number of farmers for the field officer to handle, so that they can also work on improving practices.

Yield estimates

Yield estimates are done routinely for the certified crop for all smallholder producers. There are two different arguments for making the yield estimates from the certification body. One is to hinder farmers from delivering too much produce. The other is for the certification body to know how much yield the exporter will be able to buy and thus how much product they can sell. It is also of interest for the exporter, who can plan sales.

There are quite often problems with how the estimates are done. Sometimes they are not done. With some crops, it is difficult to assess what the final yield will be, and it takes much effort and resources to make individual estimates when there are groups of thousands of smallholder farmers sometimes also with varying sizes of fields with field crops every year. Sometimes the area or the number of trees is counted and not the estimated yield. There are also crops where it is difficult to make a proper estimate; factors just before harvest can

change the yield dramatically. It should also be noted that yield estimates are not a common inspection measure for individual farms in the rest of the world (e.g., in the European Union). In the IFOAM criteria for certification of growers' groups, there is a request for yield estimates, while the EU guidance for certification of grower groups only requests figures for harvested amounts.

One of the EPOPA project leaders said:

"The yield estimates are done with lots of efforts. Sometimes the result is bad. This is not the best place to put efforts."

One of the field officers questioned the yield estimates:

"Yield estimates for cocoa are not easy, as this is evidenced by fluctuations in projected and actual yields. Farmers still struggle to keep records at farm level due to literacy levels being low. We [FOs] have continued to sensitize the farmers on the importance of records to their own benefits and not those of the company."

The operators have some different opinions:

"They are good both for the market and the organic integrity. The documents pay in the end."

"Yield estimates gives a good control of what is going on, but not really more."

There are also several negative statements from the operators.

"Yield estimates still a problem as we get a lot of questioning from the CB. The maturity of trees plays a vital role in productivity on farm."

"Yield estimates remain a problem. There are undeclared fields, and the competition is very high for sesame."

"We once had problems because there was 50 kg less vanilla sold than bought (out of 1000 kg)."

"Yield estimates has seldom worked out well; it often goes wrong. The use is mainly to know about amounts to sell, not for integrity."

"Sometimes we use the acreage and number of trees."

Recommendations:

To the international certification body: Only request the use of yield estimates if there is high risk of intrusion of conventional products and when it is felt that yield estimates can be a functioning tool in hindering this.

Certification decisions

The Naturland study

There is a study made by Naturland of the certified smallholder farmer groups in Latin America and Africa and the number and type of certification conditions they have got. Five different areas for conditions were studied: internal control records, maps, problems with internal inspectors, records of product flow, and yield estimates. In total 78 cooperatives were studied. The area rendering most conditions were the lack of field maps, where almost half of the cooperatives had a notification. The notification is the lowest grade of the certification conditions; serious notification and warning are the stronger grades of condition. For lack of (or deficient) maps, four cooperatives had the stricter grade of conditions. An explanation for the high number of notifications on maps is that the cooperatives include new members continuously and there are often no maps or bad maps at the start. For the other areas of conditions, there were many fewer notifications. There was a low number of more serious conditions. For example, regarding conditions on problems with inspectors, 70 of the cooperatives had none, four had a notification, and four had a serious notification. No one received a warning. (Evaluation of Key Problem Areas of Internal Control Systems within Coffee Cooperatives, Manfred Fürst, Naturland, 2005)

Certification decisions

Twenty certification decisions for 12 exporters were gone through. On average, the number of non-conformities per certification decision was 20. The non-conformities varied from quite serious problems to minor issues, of which there were plenty. A list of sanction categories from one of the certification bodies is presented on the next page.

Sanction categories

Cat	Sanction	Consequence of sanction
0	Description of measures required in future	----- (no non-conformity yet, but conditions must be implemented if certification for respective activities shall be granted in future)
I	Written indication	Conditions must be implemented, but no effect on this year's certification
II	Reinforced written indication	Conditions must be implemented, but no effect on this year's certification
III	Additional inspection	An additional inspection is necessary
IVa	Written Warning	No immediate consequence in current year, but repetition of the same non-conformity will lead to strong sanction next time
IVb	Imminent suspension of certification / no certification	Certified operators: Certificate is only sent to operator after correction of non-conformities. If non-conformity is not corrected with indicated time _ suspension of certification (IVc). Not yet certified operators: no certification until non-conformity resolved.
IVc	Suspension of certification	Transaction certificates are suspended with immediate effect. Contract remains valid and operator obliged to work according to organic standard. Suspension of certification may be made public. If no correction of non-conformities within 3 month _ may result in withdrawal of certification
IVd	Suspension / no certification of certain products, lots, areas	Operator certificate issued, but usually without the suspended/not certified products, lots, areas or activity. Transaction certifications and an operator certificate for these products, lots or activities will only be issued after due fulfilment of the corrective measures
V	De-certification of areas or product lots	Respective fields or product lots are de-certified (to conventional status) or de-graded (to lower conversion status) with immediate effect.
VI	Withdrawal of Certification	Operator is informed on the withdrawal of certification in writing, 2 weeks appeal period. Certification suspended with immediate effect (IVc). After appeals period import authorities and clients are informed on the withdrawal
VIIa	Financial penalties (Fines)	Fine is imposed on operator

The most common severe non-conformity was the failure to do all internal inspections. Sometimes an entire area or village was not inspected. Sometimes farmers in the group were not visited. Other severe non-conformities are a lack of ICS procedures and the way in which the growers lists are handled and how complete they are. Looking at the categorization of the international certification body, some of the non-conformities that seem to be a serious weakness or breach of a standard are actually statements that a certain product cannot be certified because there are still more data and documents needed, not because there has ever been any attempt by the exporter to cheat. One example is the need for recipes for planned processed products or certificates for organic status for ingredients in planned products. This could have been solved in a more elegant way than a certification condition. Normally conditions are imposed after something has been done the wrong way or something required has not been done. The result is that the certification decision (at first glance or to an inexperienced eye) looks more severe than is really the case.

The main outcome of going through the certification decisions is that the system is not especially well-handled or thought through. Non-conformities should be taken seriously by all parties; non-conformities are statements that the standards are not being fulfilled. Therefore it would be better to use more scrutiny in the handling and formulation of the non-conformities. It is not easy to formulate conditions in a clear and undisputable way, but for an accredited international certification body it must be possible.

In the certification decisions, some of the findings were that the non-conformity list is also used for reminders and general statements without the operator having violated a standard. There are general reminders like the following:

"ICS should be able to monitor other cash crops not included in the certification such as Coffee, Matooke."

"Please ensure that copper application remains less than 6 kg per ha and year (2.4 kg/acre)."

Probably, integrity is better-protected by being strict on the really problematic issues and avoiding making an issue out of small things with little relevance.

There is no reference to the paragraph in a standard or regulation or other requirement to which the non-conformity is related. Instead, the certification body's own formulated compliance criteria are used as a reference. They are not written in the certification decision and can only be found in the inspection report. Therefore, it is sometimes unclear what the non-conformity actually is based on, like the non-conformity "weeds are not well enough controlled" with the corrective measure "farmers also need to be trained more intensively on the benefits of a better weed management". In the EU regulation (EEC) No 2092/91, it is stated that "Pests, diseases and weeds shall be controlled by a combination of the following measures..." The normal interpretation of the text is that a range of methods can be used for getting rid of weeds but not that bad weeding would render a non-conformity.

There are quite a few non-conformities that are badly formulated. To give one example: *“Sanctioned farmers and farmers that have left the farmers’ group are not recorded on a sanctioned farmers list.”* The corrective measure that is requested is, *“Please prepare a list of all farmers that have left the group including name, farmers’ code, duration and reason for sanction.”* It is clear that there has to be control over sanctioned farmers and farmers who have left the project. Farmers who are leaving the group can be expelled through a sanction but they can also leave voluntarily for other reasons. Farmers can also be expelled because of financial reasons in the dealings between the project and the farmer; whether that is a sanction is a matter of discussion. Not all sanctions lead to farmers leaving the group; they may not be able to deliver products, or something has to be documented or arranged at the farm but they stay in the group. The way this non-conformity is formulated creates many problems and much confusion. It may well be that the project with big efforts is fulfilling the corrective measure in what they think is the direction of the decision while the certification body at next inspection visit finds out that they have not and a new condition or sanction is issued.

The time limit for when a non-conformity should be fulfilled is quite often “next inspection” in the most recent certification decisions. The time limits used in the older decisions like “always”, “constantly”, “continuously”, “continuous”, “immediately”, “ASAP”, “from now on” are less used, probably because of complaints or difficulties for the certification body to handle them. It gets confusing when “from now on”, “ASAP”, “immediately”, “constantly”, “continuous” and “always” are used in one certification decision for one company.

Annex 4 gives an example of a typical certification decision that shows many of the problems with the non-conformities described above. Details have been changed to conceal the identity of the operator. Names of crops, inspector, and certification officer and other facts have been removed.

When a certification decision reaches the exporter, it is important that the exporter read it and if needed appeal the decision instead of waiting and later realizing that the basis for the certification decision was wrong and should have been protested against.

Recommendations:

To the exporter: Read the certification decisions, ask for clarifications, and appeal certification decisions when necessary.

To the certification body: Formulate non-conformities very carefully. Always refer a non-conformity to a standard or certification requirement. Be consistent when setting time limits for fulfilling a condition and also decide when deciding on a condition what the action will be if a condition is not fulfilled by the exporter. Don’t impose sanctions on things that are not clearly regulated in the standard.

To the consultant: Support the exporter in the timely and careful handling of certification decisions. Help the exporter appeal certification decisions when needed.

6. Summary and conclusion

This study documents the experiences of EPOPA in supporting companies with contract farmers as they go through the organic certification process as well as the work done in the establishment of local certification organizations in Tanzania and Uganda.

EPOPA helped companies acquire certification through support for certification costs; technical assistance in the certification process, including negotiations with the certification bodies; training project staff to handle Internal Control Systems and contracting the certification services. In addition, EPOPA supported the establishment of local organic certification organizations in Tanzania and Uganda. Those two organizations, TanCert and UgoCert, got international accreditation in 2008 and are now well-established to service the local certification needs. The ability of the organic sector in Tanzania and Uganda to manage certification-related issues has grown markedly through the interventions of EPOPA. Nevertheless, there are many issues that pose future challenges.

For new operators, certification is often difficult to understand and handle. Many other issues, such as organic production and securing sales, are likely to be more important. From the certification body's side, it is felt that new exporters do not always take certification seriously enough.

After some years, certification has become much more understandable and manageable for the exporter, but much time and funds have been spent. There are both formal and informal contacts between the exporter and the actors that can give information about certification. At the exporter's company there is a senior person in charge of certification issues. The companies have 15 to 20 contacts a year with different actors (certification body, EPOPA, inspector) about certification. Almost all companies also use or want to use a local consultant to handle certification after the EPOPA support has ended.

The cost of certification is seen by the exporters as extremely high in the first years when no products can be sold for a higher price. When there are good sales of bigger volumes and there is a good price, the interviewed exporters see the cost of certification as a cost among others and not as such a big problem. Some of the exporters also look for a second crop produced by the same farmers for better business. It also means that certification costs can be distributed across more businesses, as the costs to add another crop to the certification are small.

Certification bodies should improve the provision of information to the operators. It is known by all certification bodies that it is difficult to get information through to the client and difficult for the client to use the information. Still simple clear information (both in writing and orally) is needed. Issues like the certification cycle, when different actions are needed, how to appeal, and how to change certification bodies are issues which should

be included in the information. The obligations for both the operator and the certification body in the contract are also important. Developing good written documents and better informing the inspector, who is the one meeting the exporter, are costly and take time. But the time is probably still well-invested because it may help avoid problems later.

In the report, there are several examples on problems which have arisen because of problems between the exporter and the certification body, misunderstandings by inspectors, certification decisions based on the wrong facts, and communication problems. Several exporters request experienced local inspectors who have knowledge of the local society and customs. Another request is to have a local office to communicate with.

Simplification of the certification system is also a way of getting a better-functioning certification system and focus on the important issues that really threaten the integrity of organic products. If used well, a risk-based approach can both save time and lead to better efficiency. Simple, focused internal inspection reports are better than long, detailed ones which are not filled in well.

The yield estimates, which often take a very long time for the field officers, can be a good tool to hinder farmers from delivering not only their own organic product but also conventional crops from someone else. But if this is not a problem, then the yield estimates are not a useful tool for the certification system and should not be requested by the certification bodies. The yield estimates can be good for the exporter to get an overview of the coming yield and products that can be sold, but then it should be up to the exporter to decide on doing them. For some crops, the yield is difficult to predict until it is harvested.

For the consultant, it has to be key to make the client capable of handling and take ownership of the system. A good consultant should make her/himself redundant and not create a dependency. However, considering the complexities of certification some operators are probably better off having a consultant back-stopping the process.

The fact that several exporters update their ICS manuals and growers lists once a year, just before the external inspection takes place, is worrying. That gives indications that the ICS system is not fully used to handle the farmers in the group, but it is through the pressure of an external visit that the needed updates are done. Exporters should take the ICS and its documentation as an ongoing task and not as a rushed job to satisfy the certification bodies.

All involved, and especially the certification bodies, should strive always to request only the absolutely essential information. They should also inform their customers well and be clear and concise on what kind of documentation is needed in the ICS system. Only facts and figures absolutely essential to the verification of compliance to the standards and certification requirements

should be requested from the exporters. The language used should be clear and comprehensible. For many involved, the language used is a second language and not the native one.

The number of documents should be kept down. For example, it is probably easier for the exporter to get all conditions for the ICS group in one document, instead of having three different documents as the group is certified to three different standards by the same certification body. The procedures used shall be clear and well-explained (self-explanatory).

Certification should be a tool, but with the degree of complication it almost becomes the main issue of organic conversion. The risk of the use of pesticides and chemical fertilizers is generally low in East Africa. The farming systems are often simple, low-input systems. The certification system shall be based on risk assessments to identify where the risk to the integrity of the production is and adapt the certification system to the local conditions. The risks experienced in the EPOPA projects have mostly been with incomplete documentation and breaking down computer systems than with farmers violating the standards.

The exporters learn how to handle the system even if with complaints on how difficult and cumbersome it is, but without any real possibility of influencing or changing the system. For the exporter, it is enough work to handle the system and achieve and maintain certification. The ones deciding on the requirements for organic certification are far away and the possibilities for influence are in practice almost non-existent.

The question arises when the group certification system as implemented by the certification bodies is too complicated and rigid; would there be a possibility of simplifying the system so that more producers could have an easier way to get certified without risking organic integrity?

Cooperation, or competition, between certification bodies can support the development of smoother and more functional practices and procedures, but competition can also lead to the certification body with the lowest requirements and interpretation of standards winning the competition. Therefore, actors outside the certification profession, e.g., farmers' organizations, consultants, or authorities are more likely to be the ones initiating any changes in the system.

The certification bodies are running the certification system but have little incentive to try to change the system. They are concerned about their own accreditors and the market access for the certified products. The creative development of the system to be simpler is not strong.

The international certification bodies want to guarantee market access to the products certified and smooth access through different import authorities. Therefore their interpretation of standards gets strict and sometimes harder than when legislation is used in its own area. Authorities in importing countries should not enforce stricter standards on imports than the de facto standards

upheld by domestic producers.⁷ There is an underlying mistrust that production far away has much more risk for breaking of organic standards than organic production nearby.

Group certification systems are needed to get smallholder farmers' products onto the market and to supply consumers with organic products. Organic production should not only be for bigger farms and plantations. But all the parties involved, from the smallholder farmer, exporters, consultants, and certification bodies to the authorities, have to work together to ensure that group certification systems are functional and trustworthy.

⁷ This is embedded in the WTO agreements.

Annexes

Annex 1 Interview questions

The following questions were asked at the interviews. There were adapted sets of questions to the different type of interviews as operator, inspector, farmer, field officer, local and international certification body, and EPOPA project leader.

Experiences of certification – operator questions

- Name and company
- Production
- Since when have they had organic production?
- Number of farmers
- Which certification bodies have they been certified by?
- Any other certifications?
- What is the view on certification? General opinions.
- What are the overall experiences and reactions of the certification of their company?
- How much time do they use to handle certification (both the interviewed person and the company as such)?
- Is the cost for certification reasonable?
- Inspections visits: reactions and impressions
- Communication/information from the CB: has it worked out?
- Service from the CB
- Have there been any problems with the certification? What kind of problems? How have they been solved?
- If starting again now, what would be done differently?
- EPOPA support: how has it worked out regarding certification?
- Has the company got the help it needed from EPOPA?
- How can EPOPA be of better service?
- Regarding the construction with EPOPA deciding which certification body, the combination of certification bodies: how has that worked out?
- Are they using / will they use support from consultants or others to handle certification?
- What would they say to another new company that needs advice about certification? (If they met an employee of the same kind as they in a new company, what would they advise about certification?)
- Other general comments

Annex 2 Questionnaire

EPOPA – evaluation of experiences of certification – operator questions

In this document, “certification” is used for the whole process of application, inspection, certification, certificates and invoices of organic production. The information in this questionnaire will be used confidentially and it will not be revealed which person or company has made a certain statement.


Name and Company _____

Do you get the service you need from the certification body (IMO, Naturland, Ceres etc.)?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	Don't know <input type="checkbox"/>	Comments	
Is the cost for certification reasonable?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	Don't know <input type="checkbox"/>	Comments	
Would your opinion be different if all products could be sold for an organic premium?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	Don't know <input type="checkbox"/>	Comments	
Is the certification (including the internal control system) a valuable tool to get control over quality of the product, the product flow, or estimation of quantities?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	Don't know <input type="checkbox"/>	Comments	
Do you feel well-informed about the inspection and certification procedures and understand what is required by the certification body?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	Don't know <input type="checkbox"/>	Comments	
Which is your main source of information about inspection and certification?	International certification body <input type="checkbox"/>	TanCert/UgoCert (office) <input type="checkbox"/>	EPOPA <input type="checkbox"/>	Inspector <input type="checkbox"/>	Comments
How many times during 2007 did you contact the following to get information about inspection and certification?	International certification body		<input type="checkbox"/> no. of times		Comments
	TanCert/UgoCert (office)		<input type="checkbox"/> no. of times		
	EPOPA		<input type="checkbox"/> no. of times		
	Inspector		<input type="checkbox"/> no. of times		
Have you got conflicting information regarding inspection and certification from the different sources?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	Don't know <input type="checkbox"/>	Please describe:	
Are there too many documents in certification?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	Don't <input type="checkbox"/>	Comments	

	<input type="checkbox"/>	<input type="checkbox"/>	know <input type="checkbox"/>	
If there are too many documents, which documents can be removed or changed to reduce the amount?	Proposed changes:			
How often is the ICS manual updated for your organic production?	Please describe:			
How often is the growers list updated for your organic production?	Please describe:			
Have the inspectors always behaved professionally and correctly?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	Don't know <input type="checkbox"/>	If No – describe:
Has the certification body always behaved professionally and correctly?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	Don't know <input type="checkbox"/>	If No – describe:
I get the certification decision from the inspector at the exit interview	Yes <input type="checkbox"/>	No <input type="checkbox"/>	Don't know <input type="checkbox"/>	Comments
I get the certification decision from the certification body	Yes <input type="checkbox"/>	No <input type="checkbox"/>	Don't know <input type="checkbox"/>	Comments
I know the contents of my latest certification decision	Yes <input type="checkbox"/>	No <input type="checkbox"/>		Comments
If the certification decision is wrong, what do you do?	Describe:			
I can manage the ICS system in our company without the help of external consultants	Yes <input type="checkbox"/>	No <input type="checkbox"/>	Don't know <input type="checkbox"/>	Comments
I have got enough support from EPOPA regarding certification	Yes <input type="checkbox"/>	No <input type="checkbox"/>	Don't know <input type="checkbox"/>	If No – describe:
How can EPOPA improve the support regarding certification?	Please describe:			
Which are your advice regarding the certification you would give to a company which is planning to start organic production? Which are the key issues in handling certification?	Please describe:			
Other comments:				

Annex 3 Example of invoice to one of the operators

Naturland e.V. Kleinhaderner Weg 1 82166 Gräfelfing



Gräfelfing 09.06.2008

Offer for Inspection and Certification [REDACTED] 2008
(Provisional Cost Estimation)

Objective: Verification as basis for organic certification according to the Regulation EEC N°2092/91, NOP/USDA and NATURLAND Standards

Project: [REDACTED]
520 smallholders farmers in five areas, re-inspection of at least 28 farmers (risk factor 1.2); processing and export

Inspector: Local inspector

Date: 2008

Honorarium:	2,0 day(s) inspection field junior inspector à 160 Euro/day	EUR	320,00
	3,0 day(s) inspection field senior inspector à 95 Euro/day	EUR	285,00
	2,0 day(s) inspection Internal Control System à 370 Euro/day	EUR	740,00
	1,0 day(s) inspection processing export and production flow à 250 Euro	EUR	250,00
	3,5 day(s) preparation, report and interaction 250 Euro/day	EUR	875,00
	2,0 days national travel senior inspector <i>reduced tariff</i> 160 Euro/day	EUR	320,00*
	2,0 days national travel junior inspector <i>reduced tariff</i> 95 Euro/day	EUR	190,00*
Expenses:	Travel expenses	EUR	as needed*
	Other expenses	EUR	as need*
	Share for International Supervision	EUR	400,00
	Residue analysis	EUR	as needed
	Office expenses	EUR	150,00
Certification:	Certification lumpsum EU	EUR	400,00
	Certification lumpsum NOP	EUR	500,00
	Naturland mebership fee 1,00 EURO/ farmer	EUR	520,00
	Total amount (excl. expenses and possible taxes)	EUR	4.950,00

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Annex 4 Example of certification decision

Example of certification decision with the list of non-conformities. Details are taken away so that it should not be possible to identify the operator. U, X, Y, Z are different areas/regions with organic farmers

List of nonconformities and Necessary Corrective Measures (Season 2006/2007) Certification to the EU Regulation (EEC) N 2092/91

OPERATOR XX Season 2006/2007					
N of CC	Cat	Non-conformity (summary)	Necessary Corrective Measures	Deadline	Status
14-0.1.2	IVd	<p>The internal inspection in region X, Y and Z were not fully carried out:</p> <ul style="list-style-type: none"> In Z the inspector did the inspection only in one place, therefore he could not verify the information received from the farmers In X and Y the internal inspector did not visit all non-cash-crop fields and also not the farmer's storage area 	<p>Please carry out a complete internal inspection in Z, X and Y. Please ensure the following inspection points are covered:</p> <ul style="list-style-type: none"> inspection of all fields and production methods (also non-cash – crop fields) inspection of storage area follow-up of the advice given to farmers during the previous inspection <p>PLEASE NOTE THAT ALL CROPS OF THE FARMERS OF THESE 3 REGIONS CANNOT BE INCLUDED IN THE CERTIFICATION UNTIL THE CONDITION IS FULFILLED</p>	Immediately	
14-3.2.2	IVd	<p>The new ICS staff seems not to be aware that during an internal inspection the whole farm has to be inspected. Therefore it was possible that the external inspector found deviations during 6 o 13 farm visits. These deviations were not mentioned in the internal inspection file.</p>	<p>The ICS staff for X, Y and Z needs to be trained and accompanied by the responsible person for internal inspectors training. The training has to be documented and confirmed to the certification body and has to start immediately. PLEASE NOTE THAT ALL CROPS OF THE FARMERS OF THESE 3 REGIONS CANNOT BE INCLUDED IN THE CERTIFICATION UNTIL THE CONDITION IS FULFILLED</p>	Immediately	
14-3.4.8	IVd	<p>The growers list does not include the following information:</p>	<p>Please update completely the growers list after the internal inspections in X, Y and Z and submit</p>	Immediately	

		<ul style="list-style-type: none"> • Correct approval status for all farmers (the list presents all farmers as “organic” yet some of them are “in-conversion”). • Date of last use o prohibited input for farmers in conversion • Name of internal inspector 	<p>to the certification body. Make sure to complete the following information:</p> <ul style="list-style-type: none"> • Correct approval status of the farmers (C0, C1, C2, organic). • Date of last use of prohibited input for the farmer in conversion • Name of the internal inspector <p>PLEASE NOTE THAT ALL CROPS OF THE FARMERS OF THESE 3 REGIONS CANNOT BE INCLUDED IN THE CERTIFICATION UNTIL THE CONDITION IS FULFILLED</p>		
14.-3.2.2	0		Please ensure that the traceability of the certified export products from region A producers is guaranteed and can be proven at any time.	All the time	
General	I	The internal inspection form used for the region A farmers is different from the form used for the rest of the farmers in the other production areas.	Please use only one type of internal inspection form	Next internal inspection	
14-3.1.1	I	There is no organisational chart in your ICS-Manual available	Please note that a written description of the organisation is not sufficient, it has to be visualised in an organisational chart.	Until next internal inspection	
14-3.3.2	I	For farmers with animals there is no procedure for preventing contamination of organic fields and crops with synthetic acaricides in controlling cattle ticks.	Please develop and implement procedures to ensure that tick control with synthetic acaricides does not contaminate the organic fields and crop. This has to be monitored by the project.	ASAP	
14-3.4.4	I	For some farmers (e.g. LB-RT-45) some non-cash-crop fields have not been indicated on the farm maps	Please ensure that all the farm fields owned by contracted farmers are indicated on the individual farm maps.	ASAP	
14-3.4.5	II	<ul style="list-style-type: none"> • The individual farm maps of the farmers in X, Y and Z lack identifying features. • Not all of the individual farm maps of the U farmers are dated. <p>(condition 2005)</p>	<ul style="list-style-type: none"> • Please date the individual farm maps for the farmers in U • Incorporate key identifying features on the farm maps which can assist in locating the farm and the respective crop fields on the farm. 	ASAP Next internal inspection.	
14-3.4.6	I	No records for home made plant protection applications are kept by the farmers	Please encourage farmers to keep records of their home made plant protection applications	ASAP	

14-3.4.6	I	There is not sufficient information regarding the use of Tephrosia and Neem as home made plant protection applications available.	Please provide information about the use of Tephrosia and Neem on the contracted farmer's fields (regarding the extent of the use, the type of preparation and the application).	Before the next internal inspection	
14-3.4.7	I	The internal farm inspection form does not have provision for checking the reporting on: <ul style="list-style-type: none"> • Whole farm conversion 	Improve the internal inspection form such that during internal inspection the following are checked: on: <ul style="list-style-type: none"> • Whole farm conversion 	Before the next internal inspection.	
14-3.4.8	I	The growers list does not show which share of the farmers land is used for cash-crop production and which share for the production of home consumption products.	Please include the following information in your growers list: <ul style="list-style-type: none"> - total amount of land per farmer - acreage used for cash crops - acreage used for home consumption crops (please mention the major crops) - 	Until next inspection	
14-3.4.6	0	Risk of drift contamination in the production areas of Y and X	Please ensure that farmers in the production areas of X and Y are closely monitored to detect risks for contamination	All the time	
14-3.3.7	II	Poor management of inorganic wastes in the area (Condition 2005)	Please train the farmers regarding the inorganic waste management on certified land	ASAP	
14-3.5	0	New processing site	Please announce to the certification body the date when the new processing unit will start handling organic product.	As early as possible	
14-3.6	I	The farmers which were inspected did not have copies of their Produce Payment Voucher	Please note that farmers have to be encouraged to keep copies of their Produce Payment Voucher	From now on	
14-3.4.4	0	-	Please ensure that copper application remains less than 6 kg per ha and year (= 2.4 kg/acre)	Continuously	

Development through organic trade

Since the early 1960s there has been a growing market in Europe, Japan and the USA for products grown in a sustainable manner and without the use of agro chemicals. The organic market has grown from US\$ 13 billion in 1998 to US\$ 30 billion in 2007. This is due to the increasing environmental concerns by the consumers in these developed countries. As such, they are willing to pay premium prices for certified organic products. Slowly but surely, governments, as well as development cooperatives, are recognising the contributions that organic agriculture can make to environmental, health, bio-diversity and food security issues.

The aforementioned situation made for a good opportunity for African countries to find premium export markets. Thus, the EPOPA programme – Export Promotion of Organic Products from Africa – was birthed by Sida in 1997.

The first two phases of EPOPA-programme from 1997-2001 and from 2002-2004 proved to be successful. In total more than 100,000 smallholders in Tanzania, Uganda and Zambia have participated. It is encouraging to note that the first two projects initiated by EPOPA, involving 30,000 farmers, are self-sustaining to this day.

The price that the farmers receive for their cash crops is 15 to 40 percent higher. Many farmers report a significant increase in productivity due to more intensive crop management measures. The farmers also produce their own food organically.

The farmers also appreciate the extra attention given to them by the extension workers and generally respond to that by caring more about farming.

The higher prices are not achieved by the organic qualification only but also by better quality products and in some cases, by more direct trading structures. In one project, the exporter is also on the fair trade coffee register. These three aspects together resulted in a 50 to 100 percent increase in income.

Read more about EPOPA at: www.epopa.info



EXPORT PROMOTION OF
ORGANIC PRODUCTS FROM AFRICA